

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

Under Civil Local Rules 7-11 and 79-5(f), Plaintiff moves the Court to consider whether material designated confidential by Uber or third parties associated with Uber should be sealed.

On December 17, 2025, Plaintiff filed her Opposition to Uber's Motion to Quash Trial Depositions which refers to and attaches documents that Uber or third parties associated with Uber designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" and / or "CONFIDENTIAL."

Material To Be Filed Under Seal

The material to be filed under seal is portions of Plaintiff's Opposition and the attached exhibits. Documents also addressed in Plaintiff's affirmative sealing motion are indicated with a star.

Document	Description	Designating Party
[Unredacted] Plaintiff's Opposition to Uber's Motion to Quash Trial Depositions	Portion of briefing referring to documents and testimony designated highly confidential and confidential	Uber

Document	Description	Designating Party
Exhibit A	Henry (Gus) Fuldner 3/26/2025 and 3/27/2025 deposition transcript	Uber
Exhibit B	Katy McDonald 5/7/2025 deposition transcript	Uber
Exhibit C	Sunny Wong 6/25/2025 deposition transcript	Uber
Exhibit D	Sunny Wong 10/14/2025 deposition transcript	Uber

Under Local Rule 79-5(f)(3), the designating entities bear the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Maya R. Kalonia in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: December 17, 2025

Respectfully submitted,

By: /s/ Sarah R. London

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Co-Lead Counsel for Plaintiffs

FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: December 17, 2025

By: /s/ Andrew R. Kaufman
Andrew R. Kaufman